



A Closer Look at the Alternative Applicability and Compliance Proposal for Table 3 Compounds

NR 445 Technical Advisory Work Group
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Proposal Introduced April 27, 2000

- ◆ Designed to ensure that source specific impact does not exceed 1 in 100,000 (10^{-5})
- ◆ Allows a source two options to avoid control technology requirements
- ◆ Takes into account real world impacts when they can be quantified



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APPLICABILITY & COMPLIANCE OPTIONS





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Details of Proposal:

- ◆ Compliance Option: would be an acceptable compliance demonstration within NR 445
- ◆ Applicability Option: would be an additional applicability “filter”
- ◆ Either could be chosen by a source, however compliance option is not available to sources of Table 3 compounds with unknown potency factors
- ◆ Source elects to receive enforceable conditions in a permit for both options



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Details - Compliance Option

- ◆ Source must include emissions of all Table 3 compounds in the site specific assessment
 - area, point and fugitive emissions
 - emissions exempt from control standard
 - emissions from MACT processes
- ◆ Assessment would be done using operational parameters (thruput, hours, etc.) to be placed in the permit



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Details (Compliance Option continued)

- ◆ Risk assessment
 - Best available modeling techniques to estimate impact from hard to model sources
 - Modeling would use site specific information and local meteorological data
 - Additive impact in cases where multi-Table 3 compounds are released



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Details (Both Options)

- ◆ Background concentrations are not included
- ◆ Multiple sources (off property) are not included
- ◆ Land use is not considered
- ◆ Synergistic effects are not considered
- ◆ Restrictions may be removed in the future provided source meets applicable BACT or LAER emission standard prior to doing so



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Sources currently regulated by BACT or LAER

- ◆ Sources currently meeting BACT or LAER would be able to utilize either option in lieu of control requirements